

**PATENT****D. REMARKS**Status of the Claims

Claims 1-4, 6-11, 13-18, and 20-23 are currently present in the Application, and claims 1, 8, and 15 are independent claims. Claims 1, 2, 6, 8, 9, 13, 15, 16, and 20 have been amended, claims 5, 12, and 19 have been cancelled, and claims 21-23 have been added.

Examiner Interview

Applicant notes with Appreciation the Examiner Interview conducted between Applicant's attorney, Examiner Strange, and Supervisory Examiner Thompson on April 21, 2005. During the Interview, the parties discussed Applicants' independent claims and the Wang reference (U.S. Pat. No. 6,826,613). The parties further discussed amending the independent claims. One suggestion was to include limitations directed towards sequence numbers, as shown in Figures 4 and 5, into Applicant's claims. The parties further discussed the fact that Mr. Papathanasiou, cited as a possible co-inventor under 35 U.S.C. § 102(f) was not a inventor of Applicant's invention but, rather, was a student intern working under the Applicant's supervision while he was temporarily employed at IBM. The Applicant has executed a declaration under 37 C.F.R. § 132 that sets forth these details. Moreover, Applicant's attorney pointed out that the résumé of Mr. Papathanasiou, identified by the Examiner, indicates that Mr. Papathanasiou was a "research intern" during the summer of 2001 and the résumé further lists the Applicant as being Mr. Papathanasiou's "advisor" during this period.

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Drawings

Applicant notes with appreciation the acceptance of Applicant's formal drawings filed concurrently with the Application.

Claim Objections Under 35 U.S.C. § 101

The Office Action rejects Applicant's "computer program product" claims (claims 15-20) as being directed to non-statutory subject matter because the description of "computer program product" in Applicant's specification included a reference to instructions downloaded over a network. While Applicant does not agree that these claims fall outside the scope of statutory subject matter under § 101. However, in an effort to expedite prosecution of Applicant's claimed invention, Applicant has amended the specification to remove the phrase "downloaded via the Internet or other computer network," from Applicant's specification. Applicant respectfully submits that, in light of Applicant's amendment, the rejection of claims 15-20 under 35 U.S.C. § 101 is now moot and respectfully requests that the Examiner withdraw this rejection.

Claim Objections Under 35 U.S.C. § 112

Claims 5, 6, 12, 13, 19, and 20 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. In particular, the Office Action noted that there was improper antecedent basis for claims 5, 12, and 19. Applicant notes that, while claims 5, 12, and 19, have been canceled, limitations found in these claims have been incorporated into the respective independent claims and that proper antecedent basis has been provided for "the first mapping table" in the

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independent claims. Claims 6, 13, and 20 have been amended so that they depend on their respective independent claims. Accordingly, Applicant submits that the rejection of claims 5, 6, 12, 13, 19, and 20 is now moot in light of Applicant's amendments and, consequently, Applicant respectfully requests the withdrawal of the rejection of these claims under 35 U.S.C. § 112, 2<sup>nd</sup> para.

Claim Rejections - 35 U.S.C. § 102(f)

Claims 1-20 stand rejected under 35 U.S.C. § 102(f) alleging that the Applicant did not invent the claimed subject matter. Applicant has submitted a declaration pursuant to 37 C.F.R. § 132 that details the fact that the alleged co-inventor, Mr. Papathanasiou was a student-employee working under the direction of the Applicant. As the Applicant declares, the Applicant solely conceived of the claimed invention and reduced it to practice. While Mr. Papathanasiou assisted Applicant in writing a paper titled "KNITS: Switch-based Connection Hand-off," (reference W), Mr. Papathanasiou provided editorial assistance and other assistance generally provided by research assistance. However, as stated by Applicant in the declaration, the assistance of Mr. Papathanasiou, while appreciated, did not rise to the level of an "inventor" as set forth in applicable statutes and the MPEP. Applicant's declaration is buttressed by the résumé of Mr. Papathanasiou, cited in the Office Action as reference (X). In the résumé, Mr. Papathanasiou describes his work experience as being a "research intern" with the Applicant being listed as Mr. Papathanasiou's "advisor." Accordingly, in light of the statements in Mr. Papathanasiou's résumé as well as Applicant's duly filed declaration under 37 C.F.R. § 132,

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Applicant respectfully requests the withdrawal of the rejection of Applicant's claims under 35 U.S.C. § 102(f).

Claim Rejections - Alleged Anticipation Under 35 U.S.C. § 102

Claims 1, 7, 8, 14, and 15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,826,613 to Wang et al. (hereinafter "Wang"). Applicant notes that claims 1, 8, and 15 have been amended to include limitations formerly found in claims 5, 12, and 19, respectively. These claims were rejected under 35 U.S.C. § 103, as described in the next section. In light of Applicant's amendments to the independent claims, Applicant notes that the rejection of claims 1, 8, and 15 is now moot. In addition, claims 7 and 14 depend on claims 1 and 8 and, therefore, the rejection of these claims is also moot in light of Applicant's amendments. Accordingly, Applicant has respectfully traversed the rejection of claims 1, 7, 8, 14, and 15 under 35 U.S.C. § 102(e).

Claim Rejections - Alleged Obviousness Under 35 U.S.C. § 103

Claims 2, 9, and 16 stand rejected under 35 U.S.C. § 103 as being obvious, and therefore unpatentable, over Wang in view of U.S. Patent No. 6,763,007 to La Porta et al. (hereinafter "La Porta") in further view of a paper by Daniel Kovacs entitled "Tutorial on Linked Lists" (hereinafter "Kovacs"). Applicant respectfully traverses the rejections.

Applicant notes that the Office Action did not reject claims 3-6, 10-14, and 17-20 as being either anticipated or obviated by any alleged prior art references. A review of the art cited in the Office Action reveals that the art does not teach or suggest the limitations set forth in these claims. Original claims 5, 12, and 19 included limitations that have

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been incorporated in the respective independent claims. These limitations include:

- writing a first reverse mapping entry to the first mapping table, the first reverse mapping entry including the second node identifier, the first node identifier and a pointer to the reverse mapping table; and
- writing a second reverse mapping entry in the reverse mapping table, the reverse mapping entry including the client node identifier.

As previously discussed, the Office Action does not cite any reference as teaching or suggesting these limitations. Indeed, a review of the references reveals that none of the references teaches or suggests using reverse mapping tables, especially in the manner claimed by Applicant. Therefore, Applicant respectfully submits that claims 1, 8, and 15 are each allowable over the art of record and respectfully requests an allowance of these claims. The remaining claims, 2-4, 6-7, 9-11, 13, 14, 16-18, and 20-23 each depend, directly or indirectly, on one of the independent claims and, therefore, are each allowable for at least the same reasons that the independent claims are allowable.

**Additional Claims**

Applicant has added claims 21-23 directed as recording ranges of sequence numbers when performing a handoff in order to determine whether to redirect a packet to a second node. Support for these claims is found in Figures 4 and 5 and the corresponding text. During the Examiner Interview, the Examiners suggested adding claim limitations directed at the sequence numbers and ranges described in Applicant's Figures 4

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and 5. Applicant respectfully requests consideration of claims 21-23.

Conclusion

As a result of the foregoing, it is asserted by Applicant that the remaining claims in the Application are in condition for allowance, and Applicant respectfully requests an early allowance of such claims.

Applicant respectfully request that the Examiner contact the Applicant's attorney listed below if the Examiner believes that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

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